

# **EXHIBIT 4**

## **CERTIFICATE OF SERVICE**

**THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	X	
	:	<b>Chapter 9</b>
<b>In re:</b>	:	<b>Case No. 13-53846</b>
<b>CITY OF DETROIT, MICHIGAN,</b>	:	<b>Hon. Steven W. Rhodes</b>
Debtor.	:	
	:	
	:	

CITIZENS UNITED AGAINST  
CORRUPT GOVERNMENT,  
Plaintiff,

Adv. Case No. \_\_\_\_\_

V

DETROIT CITY COUNCIL,  
Defendant.

**CERTIFICATE OF SERVICE**

I, ANDREW A. PATERSON, certify that the foregoing *Petitioner's Emergency Motion for Remand* was filed and served via the Court's electronic case filing and noticing system this 9<sup>th</sup> day of October, 2014, which will send notification of such filing to all attorneys and parties of record registered electronically.

/S/ Andrew A. Paterson (P18690) \_\_\_\_\_  
Attorney for Petitioners  
46350 Grand River, Suite C  
Novi, MI 48374  
(248) 568-9712  
[Aap43@hotmail.com](mailto:Aap43@hotmail.com)

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